

REMARKS

This application has been reviewed in light of the Office Action dated January 24, 2007. Claims 1-16 are presented for examination, of which Claims 1 and 9 are in independent form. Claims 1-4 have been amended to define Applicants' invention more clearly. New Claims 9-16 have been added to provide Applicants with a more complete scope of protection. Favorable reconsideration and consideration are requested.

Claims 1, 4, 7, and 8 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,798,508 (*Walker*); and Claims 2, 3, 5, and 6 were rejected under § 103(a) as being unpatentable over *Walker* in view of official notice. Applicants submit that independent Claims 1-8, together with the claims dependent therefrom, are patentably distinct from the cited prior art for at least the following reasons.

Claim 1 is directed to a system configured to facilitate the transmission of messages from a seller to a supplier. The system includes a plurality of seller applications operable to store end-purchaser information and to populate a message wherein each one of the plurality of seller applications accesses the information through a different interface at the premises of the seller. The system further includes a supplier application and a Web application coupled to it. The Web application is operable to accept user input containing one or more portions of the message. A proxy application is coupled between the seller applications and the supplier application, and is configured to encrypt/decrypt and transmit data from the seller applications to the supplier application.

Among other features of Claim 1 is "a plurality of seller applications operable to store end-purchaser information and to populate a message wherein each one of the plurality of seller applications accesses the information through a different interface

at the premises of the seller.” By virtue of this feature, multiple seller applications at the location of the seller “can be used to populate a message.” This allows a seller to integrate its existing back office, intranet, or any other application with application server 108. (*See* Specification, paragraph [0024]).

Walker apparently relates to a system and method for issuing and clearing traveler’s checks that are paid for by credit card. Apparently, a seller transmits a customer’s credit card account number and the amount of traveler’s checks purchased in a message to a credit card clearing house. The clearing house then transmits a purchase authorization to the seller. Then the seller delivers the traveler’s checks to the customer and transmits a message including the credit card account number, the sale amount, lock authorization, and the lock amount to traveler’s check issuer. Finally, upon receipt of the message, the traveler’s check issuer records in a database information relating to the customer and to each check delivered to that customer.

Nothing has been found in *Walker* that is believed to teach or suggest “a plurality of seller applications operable to store end-purchaser information and to populate a message wherein each one of the plurality of seller applications accesses the information through a different interface at the premises of the seller,” as recited in Claim 1.

Accordingly, Applicants submit that Claim 1 is not anticipated by *Walker*, and respectfully request withdrawal of the rejection under 35 U.S.C. § 102(e).

Applicants respectfully traverse the rejections of Claims 2, 3, 5, and 6 under 35 U.S.C. § 103(a) for at least the following reasons. In paragraph six of the Office Action the Examiner states:

“...It is old and well known in the art to use web applications and using SOAP messages conforming to

WSDL. It would have been obvious to one of ordinary skilled in the art at the time the applicant's invention was made to modify the teachings of Walker to include that the seller application is a web services application, using SOAP and HTTP between the seller application and the supplier application..."

The Examiner has not provided any support for this statement, and Applicants believe that it is entirely speculative. Applicants therefore respectfully traverse this assertion and, to the extent that the Examiner is relying on common knowledge in the art or on a scientific theory, request that the Examiner cite a reference in support of this position, in accordance with M.P.E.P. §§ 2144.02 and 2144.03.

Accordingly, Applicants submit that Claims 2, 3, 5, and 6 are patentable over the cited art, and respectfully request withdrawal of their rejection under 35 U.S.C. § 103(a).

Claim 9 corresponds to Claim 1 and includes a feature similar to that discussed above, in which "a plurality of seller applications operable to store end-purchaser information and to populate a message wherein each one of the plurality of seller applications accesses the information through a different interface at the premises of the seller." Therefore Claim 9 is believed to be patentable for at least the same reasons as discussed above with respect to Claim 1.

The other rejected claims in this application depend from one or another of the independent claims discussed above and, therefore, are submitted to be patentable for at least the same reasons. Because each dependent claim also is deemed to define an additional aspect of the invention, individual consideration or reconsideration, as the case may be, of the patentability of each claim on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

Applicants' undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

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